



Littler Mendelson, P.C.
900 Third Avenue
New York, NY 10022-3298

Jean L. Schmidt
212.497.8486 direct
212.583.9600 main
646.417.7534 fax
jschmidt@littler.com

July 19, 2023

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Guelda Brown v. Montefiore Medical Center, et al.*
Case No. 1:18-cv-03861-PGG-KHP

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: July 21, 2023

Dear Judge Gardephe:

This firm represents the Defendants Montefiore Medical Center, Aretha Mack, Veronica Crute, and Anthony Leung ("Montefiore Defendants") in the above-referenced matter. On Friday, June 16, 2023, we were contacted by Your Honor's Clerk and asked to file a complete copy of the transcript of the deposition of Plaintiff Guelda Brown for the Court to review in connection with the Montefiore Defendants' pending motion for summary judgment (ECF Nos. 91-97).

To protect the confidentiality of documents and information regarding Plaintiff's medical condition, certain portions of her deposition transcript were designated as confidential. Consequently, we wrote to the Court on June 22, 2023, to request that the Montefiore Defendants be permitted to file the deposition transcript with certain portions redacted. The only portions of the deposition that we propose be redacted are those portions which deal with Plaintiff's medical condition, and which were marked "Confidential" per agreement of the parties.

On July 12, 2023 (ECF No. 118), the Court denied the motion without prejudice to Defendants filing a motion for more limited redactions. In accordance with the Court's order, we have redacted only those portions of the transcript that deal with Plaintiff's medical records, treatment, and diagnoses.

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In accordance with Your Honor's Individual Rules, we are publicly filing the deposition with the proposed redactions and electronically filing under seal a copy of the unredacted deposition with the redactions highlighted.

For the reasons set forth above, we respectfully request that the Court approve the redacted filing of Plaintiff's deposition transcript.

We thank Your Honor for your consideration.

Respectfully submitted,

/s/ Jean L. Schmidt

Jean L. Schmidt

cc: Guelda Brown (via Fed-Ex)